

**From:** [Matt Wickham](#)  
**To:** [Josiam, Raji](#)  
**Subject:** RE: Workplan Refinement Notice AOI-1-4  
**Date:** Wednesday, January 25, 2017 12:09:28 PM  
**Attachments:** [removed.txt](#)  
[image006.png](#)

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Yes, that would be fine!

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**From:** Josiam, Raji [<mailto:josiam.raji@epa.gov>]  
**Sent:** Wednesday, January 25, 2017 12:05 PM  
**To:** Matt Wickham  
**Subject:** RE: Workplan Refinement Notice AOI-1-4

Matt

I got your voice mail message. Sorry I missed your call. I am on a webinar till 2 pm or so. Can I call you at 2:15 pm?

*Raji Josiam*

*Remedial Project Manager*

*US EPA Region 6*

*1445 Ross Ave, Suite 1200, 6SF-RA*

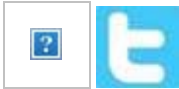
*Dallas, TX 75202*

*Email: [josiam.raji@epa.gov](mailto:josiam.raji@epa.gov)*

*Direct: 214-665-8529*

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*Superfund: 1-800-533-3508*



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**From:** Matt Wickham [<mailto:matt.wickham@pbwllc.com>]  
**Sent:** Wednesday, January 25, 2017 10:31 AM  
**To:** Josiam, Raji <[josiam.raji@epa.gov](mailto:josiam.raji@epa.gov)>  
**Cc:** Eric Pastor <[eric.pastor@pbwllc.com](mailto:eric.pastor@pbwllc.com)>; Lam Tran <[lam.tran@tceq.texas.gov](mailto:lam.tran@tceq.texas.gov)>  
**Subject:** RE: Workplan Refinement Notice AOI-1-4

Raji – we are working on our response to the comments and I’ve prepared a first draft. I’m having trouble getting everyone on a conference call this week, so it looks like next week before we can gather. I will give you a call as soon as we can discuss the comments internally.

Thanks

Matt

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**From:** Josiam, Raji [<mailto:josiam.raji@epa.gov>]  
**Sent:** Friday, January 20, 2017 3:00 PM  
**To:** Matt Wickham <[matt.wickham@pbwllc.com](mailto:matt.wickham@pbwllc.com)>  
**Cc:** Eric Pastor <[eric.pastor@pbwllc.com](mailto:eric.pastor@pbwllc.com)>; Lam Tran <[lam.tran@tceq.texas.gov](mailto:lam.tran@tceq.texas.gov)>  
**Subject:** RE: Workplan Refinement Notice AOI-1-4

Matt

EPA and TCEQ have reviewed the Work Plan Refinement/Modification Notice WRN-AOI-1-4 and here are our comments based on the limited historical information available to us. If you would like to discuss these comments over a conference call, please let us know.

#### Additional Investigation of the Possible Historic Burial Pit

1. Paragraph 2 – Please include the date when the geophysical survey was completed rather than “late September”.
2. Paragraph 3 – Please briefly include description of the findings from the Soil Borings SB-1, SB-2, and SB-3 and how the findings correlate to the additional investigation proposed.
3. Paragraph 4 - The WRN is based on historic information that has not been included with the WRN. Please provide a reference for the historical information used in the WRN, and where appropriate please include as an appendix.
4. Paragraph 4 - Based on review of the Bayer CropScience 104(e) response, operations included the blending and storage of liquid, solid granular and solid-dust herbicides and pesticides. Documents show that Chipman manufactured or formulated chlorate and borate pesticides and herbicides as well as arsenical pesticides. Miscellaneous organic pesticides may have also been stored at the facility. The soil from the tank farm area was excavated and placed in the burial pit southwest of the site. Since, the soil in the historical burial could have other hazardous substances other than just arsenic, the samples would need to be sampled for the suite of analytes as specified in the FSP – VOCs, SVOCs, metals, total petroleum hydrocarbons, pesticides, and herbicides rather than just arsenic.
5. Please include provision for split samples with EPA RI/FS Oversight Contractor.  
Other areas look into during this investigation or during future investigation:
6. There is indication from the Bayer CropScience 104(e) response that the soil was buried in three “borrow pits” in the southwest portion of the property. The response does not include figures and hence it is not clear where these burial pits are and if they are all in the “historical burial pit” area identified in Figure 1 of WRN AOI-1-4. Are there other burial pits that must be investigated, if not this round, in the future?
7. The Bayer CropScience 104(e) response also indicates that 200 feet of railroad track was removed and contaminated soil from underneath the railroad track was placed in a pit. It is unclear which pit this was placed in. Do we have historical information where this contaminated soil was placed?
8. From the Bayer CropScience 104 (e) response it is not clear what waste was buried under the “Former Buried Waste Pit” indicated in Figure 2 of the WRN AOI-1-4. It appears that the waste from the "Former Buried Waste Pit" was excavated and shipped to Waste Management's Atascocita Landfill in Texas based on an August 2005 update provided in the 104(e) response. What historical documents are available regarding this “Former Buried Waste Pit” area?

#### Potential Historic Vault and Culvert

9. Paragraph 1 – This paragraph indicates that it will be identified whether the structure that was uncovered was related to the function of the railroad spur. Do we have historical information indicating what is part of the railroad spur? The Bayer CropScience 104(e) response refers to an existing underground culvert system immediately west of the office building where they were rerouting the roof runoff and the water from the slab to prevent gullies being caused by rainwater to the north and east of the building areas. Could the culvert you are referring to here be part of that system. Are there drawings that would show the culvert system?
10. Paragraphs 1-4 - Based on review of the Bayer CropScience 104(e) response, the vault is shown in all the historical plant drawings provided with the response to be a blending/mixing

tank and is underground attached to the building rather than a stand-alone vault shown in Figure 2 of WRN AOI-1-4. There is no indication of this vault/tank to be connected to the railroad spur in this 104(e) response document. The 104(e) response document indicates that the vault is 16'10" deep. Is the vault specified in Figure 2 the same as the vault in the historical plant drawings in the 104(e) response document?

11. Paragraph 4 – This paragraph indicates that test pits will be dug. Will soil samples will be taken from these test pits or are these pits strictly to determine the underground obstructions? Based on the Bayer CropScience 104(e) response, the historical samples from the vault and tank included arsenic, copper, volatile and semi-volatile organics, and pesticides. The response document also indicates that the soil borings taken outside of the vault indicate elevated levels of arsenic, copper, and pesticides. Also due to the unknown nature of type of materials handled inside the facility, any sampling being done around the vault area would need to include the whole suite of analytes as specified in the FSP.
12. Please include provision for split samples with EPA RI/FS Oversight Contractor.

Figure 1

13. The size and shape of "Possible Historic Burial Pit" is different from that was presented in WRN AOI-1-2. To avoid confusion, please include the label in the legend with a date next to it rather than in the figure itself as an example - "Possible Historic Burial Pit Extent (Approx.) as of Sept 2016"
14. From the R1-R1, R2-R2, R3-R3, transects of the resistivity survey the "Potentially Disturbed Soil" does not seem to match the "Potentially Disturbed Soil" with the Electromagnetic survey. Why is there a big difference? Can the labels for the resistivity survey transects be called something else so that it is not confusing for someone looking at the figure?

Figure 2

15. If the vault is the same as that in Bayer CropScience 104(e) response drawings, then the vault would need to be attached to the building. Also since the vault is still there should it be called "Historic Vault (Approx.)" rather than "Former Vault (Approx.)"?

*Raji Josiam*

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**From:** Matt Wickham [<mailto:matt.wickham@pbwllc.com>]

**Sent:** Friday, January 06, 2017 4:45 PM

**To:** Josiam, Raji <[josiam.raji@epa.gov](mailto:josiam.raji@epa.gov)>

**Cc:** Eric Pastor <[eric.pastor@pbwllc.com](mailto:eric.pastor@pbwllc.com)>

**Subject:** Workplan Refinement Notice AOI-1-4

Hi Raji –

Please find attached for your review Workplan Refinement/Modification Notice (WRN) AOI-1-4 for

the US Oil Recovery Superfund Site. This WRN proposes additional on-property soil investigation activities.

Please review this WRN and let me know if it is acceptable or if you have any questions/comments/revisions.

Thanks,

Matt



**MATTHEW K. WICKHAM, P.G.**

**PRINCIPAL HYDROGEOLOGIST**

**CORPORATE HEALTH AND SAFETY DIRECTOR**

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